

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO:</b> _____
<b>v.</b>	:	<b>DATE FILED:</b> <u>September 16, 2021</u>
<b>AMMAR JALI</b>	:	<b>VIOLATION:</b>
	:	<b>26 U.S.C. § 7206(1) (subscribing a</b>
	:	<b>false income tax return - 1 count)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

**BACKGROUND**

At all times material to this indictment:

1. Defendant AMMAR JALI, a resident of Bethlehem, Pennsylvania, was the owner and the sole shareholder for calendar year 2014 of 36 franchisee Domino's Pizza restaurants located throughout the Eastern District of Pennsylvania and elsewhere.
2. Defendant AMMAR JALI formed a separate company for each Domino's Pizza store he owned, all of which were formed as sub-chapter S Corporations.
3. As a result of forming the sub-chapter S Corporations, defendant AMMAR JALI had to report the income generated by the separate Domino's Pizza franchises on his personal income tax return.
4. Defendant AMMAR JALI maintained the books and records for each company, handled the filing of federal and state income tax returns, and authorized store employees to make bank deposits.
5. Defendant AMMAR JALI hired an accountant to prepare his personal

income tax returns and Form 1120S tax returns for the sub-chapter S Corporations. However, defendant JALI did not provide the accountant with all the necessary information to complete a truthful return, that is, he failed to advise the accountant of approximately \$2,288,493 in gross receipts, and additional gross receipts of \$640,996, which represented rebates from Domino's Pizza and Coca Cola for calendar year 2014.

6. Defendant AMMAR JALI's omission of the gross receipts from the amounts he reported on the subchapter S corporate tax returns resulted in an understatement of his flow-through income on his individual tax return and the evasion of approximately \$703,275 in personal income tax for calendar year 2014.

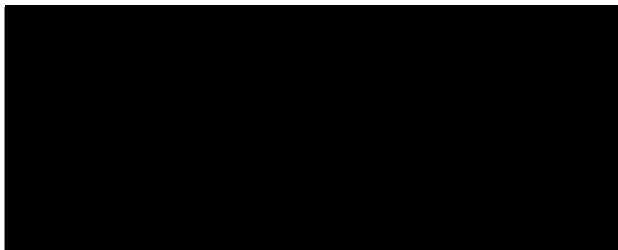
7. On or about September 18, 2015, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**AMMAR JALI**

willfully made and subscribed an Individual Income Tax Return, Form 1040, for the calendar year 2014, which was verified by a written declaration that it was made under the penalty of perjury, which defendant JALI did not believe to be true and correct as to every material matter, in that the return reported \$297,985 of total income (line 22) and \$215,921 of taxable income (line 43) for calendar year 2014, when, as defendant JALI then and there knew and believed, the total income and taxable income he realized for calendar year 2014 were greater than the amount that he reported.

In violation of Title 26, United States Code, Section 7206(1).

**A TRUE BILL:**



*Ronald Barack for*

---

**JENNIFER ARBITTIER WILLIAMS**  
**Acting United States Attorney**

No. 21-

---

**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

---

THE UNITED STATES OF AMERICA

vs.

AMMAR JALI

INDICTMENT

26 U.S.C. § 7206(1) (subscribing a false income tax return – 1 count)

---

Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

---

Clerk

---

Bail, \$ \_\_\_\_\_

---